

1 Katherine L. Kettler (SBN 231586)
klk@millerlawgroup.com

2 Jennifer A. Shy (SBN 131074)
jas@millerlawgroup.com

3 MILLER LAW GROUP
A Professional Corporation
4 111 Sansome Street, Suite 700
San Francisco, CA 94104
5 Tel. (415) 464-4300
Fax (415) 464-4336

6
7 Attorneys for Defendant
AT&T UMBRELLA BENEFIT PLAN NO. 1

8
9 Lee S. Harris (SBN 076699)
LHarris@g3mh.com
10 GOLDSTEIN, GELLMAN, MELBOSTAD,
HARRIS & MCSPARRAN, LLP
11 1388 Sutter Street, Suite 1000
San Francisco, CA 94103
12 Tel: (415) 673-5600
Fax: (415) 673-5606

13 Attorneys for Plaintiff
14 LOUIS J. VELA

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17

18 LOUIS J. VELA,

19
20 Plaintiff,

21 v.

22 AT&T UMBRELLA BENEFIT PLAN NO. 1,

23
24 Defendant.
25
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Case No.: CV 08 1575 MMC

**AMENDED
STIPULATION AND [PROPOSED] ORDER
TO FURTHER CONTINUE FILING DATES
RELATED TO PARTIES' MOTIONS FOR
SUMMARY JUDGMENT**

Complaint filed: March 21, 2008
First Am. Complaint filed: May 14, 2008
Second Am. Complaint filed: Oct. 9, 2008

1 Plaintiff Louis Vela ("Plaintiff") and Defendant AT&T Umbrella Benefit Plan No. 1
2 ("Defendant") (collectively the "Parties"), by and through their respective counsel of record,
3 hereby stipulate as follows:

4
5 The Parties previously stipulated to a briefing schedule in support of their
6 respective Motions for Summary Judgment as reflected in the Court's Order filed on October
7 24, 2011 (Docket No. 90). Now, the Parties stipulate and respectfully request the Court to
8 further continue the Parties' present deadline for re-noticing their respective Motions for
9 Summary Judgment and for filing Further Briefing, from December 5, 2011 **to February 28,**
10 **2012**, and continue the Parties' present deadline for filing their respective Responses to
11 Further Briefing from December 19, 2011 **to March 16, 2012.**

12
13 The Parties request the continuation of the pending dates as they have agreed,
14 through their respective counsel, to engage in further good faith efforts to informally resolve
15 this dispute through private mediation, to be scheduled for a mutually agreeable date.

16
17 In the event that informal resolution is unsuccessful, with regard to the
18 scheduling of any hearing on the Parties' respective Motions for Summary Judgment, counsel
19 for the Parties have met and conferred regarding their respective calendars and availability.
20 Counsel for the Parties respectfully request that the Court schedule any hearing on the
21 Parties' Motions for Summary Judgment for **no earlier than the week of April 16, 2012.**

22
23 The Court has scheduled a further Case Management Conference in this case
24 for January 20, 2012, at 10:30 a.m. (Docket No. 88). In the event that the Court wishes to set
25 a further Case Management Conference in this case, the Parties respectfully request that any
26 further Case Management Conference be set **no earlier than the week of April 16, 2012.**

1 IT IS SO STIPULATED.

2
3 Dated: November 30, 2011

GOLDSTEIN, GELLMAN, MELBOSTAD,
HARRIS & MCSPARRAN, LLP

4
5 By: /s/

6 Lee S. Harris
7 Attorneys for Plaintiff
8 LOUIS J. VELA

9 Dated: November 30, 2011

MILLER LAW GROUP
A Professional Corporation

10
11
12 By: /s/

13 Katherine L. Kettler
14 Attorneys for Defendant
15 AT&T UMBRELLA BENEFIT PLAN NO. 1

16 The Parties' deadline for re-noticing their respective Motions for Summary
17 Judgment and for filing Further Briefing in support of those motions, currently set for
18 December 5, 2011 is hereby CONTINUED to February 28, 2012.

19 The Parties' deadline for filing their respective Responses to Further Briefing,
20 currently set for December 19, 2011 is hereby CONTINUED to March 16, 2012.

21 The Case Management Conference, currently scheduled for January 20, 2012
22 at 10:30 a.m., is hereby CONTINUED to June 1, 2012, at 10:30 a.m.

23
24 IT IS SO ORDERED.

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26 Dated: December 2, 2011


HONORABLE MAXINE M. CHESNEY

27 4833-8798-3630, v. 1